

MEMO ENDORSED

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June 13, 2022

The Honorable Valerie E. Caproni
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Paguada v. Mix Unit, LLC*; Case No. 1:22-cv-01552-VEC

Dear Judge Caproni:

We represent plaintiff Dilenia Paguada (“Plaintiff”) in the above-referenced action. We submit this letter to respectfully request an adjournment of the initial conference set for June 24, 2022, at 10:00 a.m. Plaintiff requests this adjournment since Defendant’s answer was due on April 8, 2022, and they have yet to appear or contact Plaintiff. Plaintiff requests 30 days to obtain a certificate of Default as to Defendant, *Mix Unit, LLC*, and to file an Order to Show Cause for Default Judgment in accordance with the Court’s individual rules. This is Plaintiff’s first request for such extension.

Thank you for your consideration in this matter.

Respectfully submitted,
/s/ Edward Y. Kroub
EDWARD Y. KROUB

cc: All Counsel of Record (via ECF)

Defendant's deadline to answer, move, or otherwise respond to the complaint is June 24, 2022, the date of the initial pretrial conference. *See* Order, Dkt. 5 ¶ 1 (using bold font). Given that Plaintiff's counsel has filed dozens of cases before the Undersigned, he should be well aware of the Court's practices in website ADA cases.

The Court hereby adjourns *sine die* the parties' pre-conference submission deadline and the initial pretrial conference, currently scheduled for Friday, June 24, 2022 at 10:00 A.M. If Defendant does not answer, move, or otherwise respond to the complaint by **Friday, June 24, 2022**, then Plaintiff must move for a default judgment, in line with the Undersigned's Individual Practices in Civil Cases, by no later than **Friday, July 8, 2022**. If Defendant does answer, move, or otherwise respond to the complaint, the Court will reschedule the initial pretrial conference.

Plaintiff must serve a copy of this Endorsement on Defendant and file proof of service on the docket by no later than **Thursday, June 16, 2022**.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni", is written over the printed name.

Date: June 13, 2022

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE